



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

SEP 18 2018

Mr. Lawrence C. Rosen
Environmental Operations, Inc
1530 South Second Street, Suite 200
St. Louis, Missouri 63104-4500

RE: Comments on the Corrective Measures Implementation Monitored Natural Attenuation Monitoring and Vapor Intrusion Work Plan dated August 31, 2018, for the former Solutia - J.F. Queeny Site, St. Louis, Missouri
EPA ID # MOD004954111

Dear Mr. Rosen:

The U.S. Environmental Protection Agency Region 7 and Missouri Department of Natural Resources have completed their review of the subject document and are providing the following comments to be incorporated into a revised Work Plan to be submitted to the agencies within 30 days of the date of this letter.

1. Page iv: The third paragraph of the Executive Summary should also reference the Restrictive Covenant that is recorded for the majority of the site. The covenant should also be included as an appendix to the work plan.
2. The Groundwater Monitoring Plan and the Quality Assurance Project Plan should be revised to reflect any changes or updates that have occurred since their approval.

If you have any questions concerning this matter, please call me at (913) 551-7755.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Morrison".

Bruce A. Morrison
Project Manager
RCRA Corrective Action and Permits Section
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR
Stacy Hastie, SWH Investments
Eric Page, EOI

RCRA 9/18/2018



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